

### REMARKS/ARGUMENTS

The applicant's attorneys appreciate the Examiner's remarks.

Submitted herewith is a replacement sheet containing corrected Figure 2. The corrected Figure 2 is now consistent with the original disclosure in Provisional Application No. 60/175,802 (copy enclosed). Furthermore, Figure 2 now properly illustrates the disclosed description in the application, parent application and the provisional application which calls for the lead frame to be insert molded within the insulation housing.

Furthermore, the specification has been amended to change the designation of the present application to a continuation-in-part. It should be noted that the claims are directed to the subject matter that is common with the parent application and the provisional application. A new oath will be submitted in due course.

In addition, the specification has been amended to correct an obvious error with respect to the description of Figure 2, as well as other obvious errors.

Responsive to the objection set forth against claim 10, claim 10 has been amended to depend from claim 1. Withdrawal of the objection is requested.

The allowance of claims 14-20 is acknowledged with appreciation.

Claim 1 has been rejected as anticipated by Kagawa. Reconsideration is requested.

An advantage of a module according to the present invention is that it does not require a ceramic-based substrate such as an IMS, or a DBC. Therefore, a module according to the present invention is less expensive to manufacture.

On the other hand, Kagawa discloses a module which uses a ceramic based substrate as a base. Specifically, Kagawa calls for

a ceramic substrate 2 having good thermal conductivity, such as BeO, secured to the upper surface of the heat sink 1, and two ground pads 3 and a collector pad 4, spaced from each of the ground pads 3, on the ceramic substrate 2. The components 1, 2, 3 and 4 are parts of a base member.

Thus, as detailed in Kagawa, pads 3 and 4 are "metallization layers", col. 2, line 44, formed on a ceramic body 2. In a module according to Kagawa, therefore, the semiconductor die are disposed on metallizations 3 and 4.

On the other hand, claim 1 calls for the power device to be mounted on a conductive pad, which is integrally connected to an external lead. The external lead is provided for external connection, as recited in claim 1. However, Kagawa does not state that the metallization layers 3, 4 to which the die are connected serve as leads for external connection or are integral with leads for external connection.

Furthermore, claim 1 calls for an opening in the housing element through which a surface of the conductive pad opposite to the surface on which the die resides is exposed. Examples of such openings are windows 51, 52, 53, 54 in housing 50 through which one surface of each die pad is available for connection to the die, and the other surface is left open so that it may make contact with a thermally conductive insulation body 70, whereby heat can be transferred to a heatsink.

On the other hand, Kagawa does not show or suggest such features. Instead, Kagawa only shows a variation of the prior art in which a ceramic based substrate is used as a base for a power semiconductor module. Reconsideration of claim 1 is, therefore, requested.

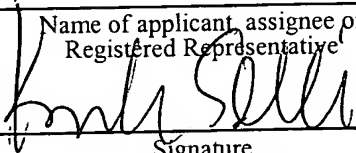
Claims 2-13 depend from claim 1. Each of these claims includes other limitations, which in combination with those of its base claims are not shown or suggested by the prior art of record. Reconsideration is requested.

The application is believed to be in condition for allowance. Such action is earnestly solicited.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on February 22, 2005:

Kourosh Salehi

Name of applicant, assignee or  
Registered Representative



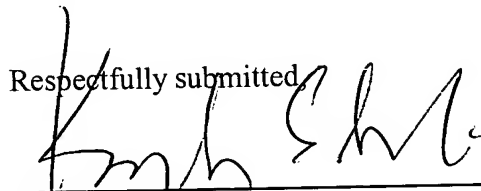
Signature

February 22, 2005

KS:gl

Date of Signature

Respectfully submitted



Kourosh Salehi

Registration No.: 43,898

OSTROLENK, FABER, GERB & SOFFEN, LLP

1180 Avenue of the Americas

New York, New York 10036-8403

Telephone: (212) 382-0700

### **AMENDMENT TO THE DRAWINGS**

Fig. 2 has been amended. The attached sheet of formal drawings replaces the original sheet including Figs. 1 and 2.



Mark-Up

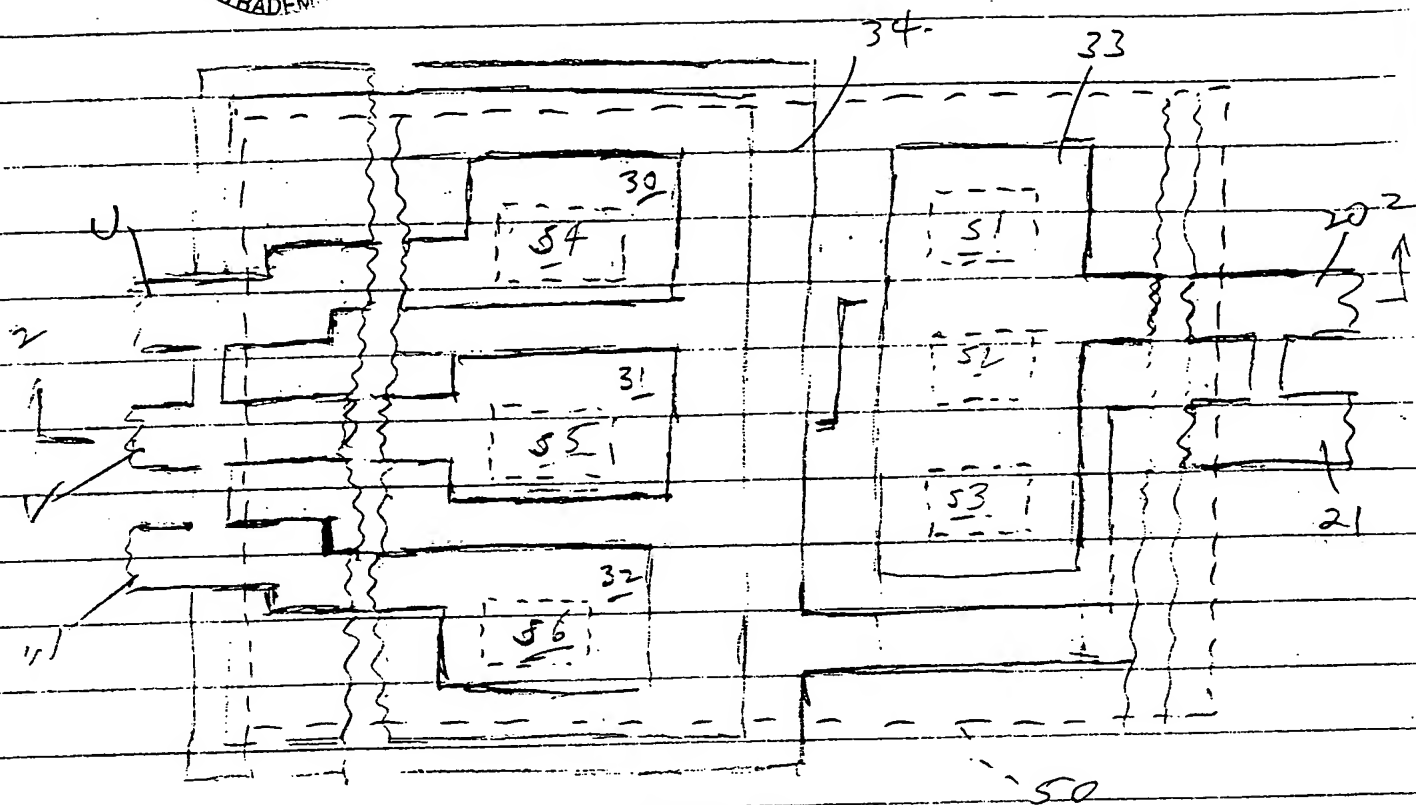


FIGURE 1

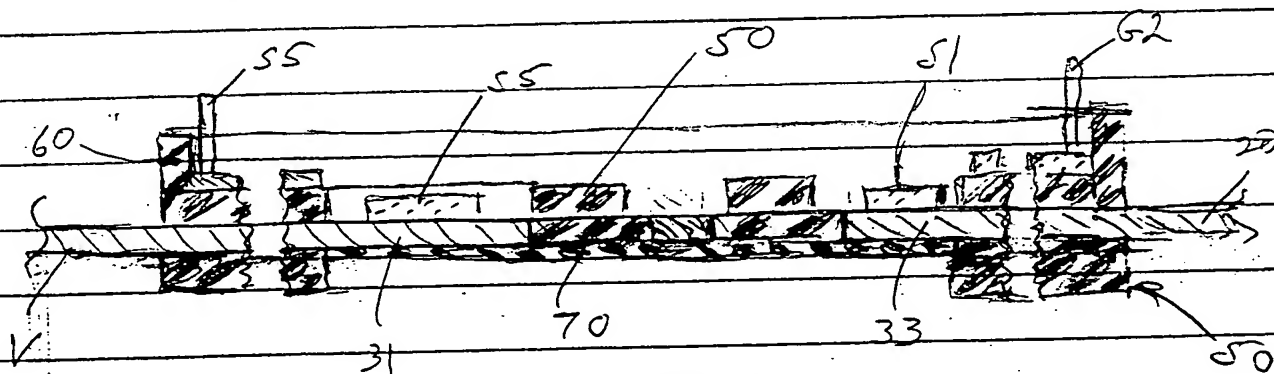


FIGURE 2